

Clarifications for Revision 1.1

Revision 1.1 Clarifications from January 22, 2006 email from LURC

Basic LURC development form -

1. Where is the "TRI" for the underground portion of the power line (under Route 27)? In the CMP permit? This permit is only for 12 months, and I noted it was already renewed once. Is this an issue?

Yes, the CMP location permit in Section 2 of the permit application addresses the portion of the power line under and beside route 27. This is not an issue because it is a location permit only. What this means is that CMP will apply for a construction permit from MDOT for the construction phase of the project. We are working closely with CMP on timing of all phases of the project. You are right, the permit expires this June and if CMP doesn't apply for a construction permit before that date they will need to extend the location permit for another year. This is not an issue.

2. Where is the TRI for the utility lines and new access roads on the Dallas Company land located?

You will find all Dallas TRI information In Section 2 of the permit application under Black Nubble Deed & Exhibits and Black Nubble Expansion Deed. The original deed with Dallas is for the Black Nubble property and easements for powerlines and roads. The Expansion Deed, executed last year, has some additional parcels of land and some changes to the easements such as road widths. It also has wording on waiver of turbine setbacks and ice throws onto Dallas property. The Redington Pond Range Deed is for the purchase of the Redington property.

3. Land division history - The information summarized in the LURC form doesn't include other lots that may have been split off from the original lot within five years of the purchase by Endless Energy. Also, it appears that the information supplied is only for one lot (Redington Mtn?), not the other (Black Nubble?)

As always, Marcia, you're correct. I will add two lines to include the Redington lot and an additional purchase made last fall to increase Black Nubble by about 40 acres.

*Dallas Company to RMW LLC 10/1/03 +/-459 acres
Dallas Company to RMW LLC 9/21/05 +/-40 acres*

4. Lot ownership information - Does this include all lots currently owned by Endless? Are the "strip of land" and the maintenance building lot included in this? What about easement areas - are there lot and map numbers for those?

The maintenance building lot is Map FR005 Plan 01 Lot 1.4.

In 2005 RMW purchased 3 more parcels from Dallas. Maine Revenue Services told me they will assign a lot # on April 1st when they do their tax assessments and I believe the 3 parcels will be placed into a single lot. The Dallas Deed is recorded in Book 2366, p. 80 and is currently Lot 1(Dallas property).

<i>Parcel 1 Black Nubble extension to allow more room for turbine 30</i>	<i>21.57 acres</i>
<i>Parcel 2 Black Nubble eastern extension for more room for turbine 16</i>	<i>6 acres</i>
<i>Parcel 3 Strip of land that connects northern end of Black Nubble to maintenance lot</i>	<i>13.27 acres</i>

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According to Maine Revenue Services, the Dallas Company has only one lot in all of Redington Township. FR005, Plan 01, Lot 01. I asked MRS for lot/map numbers for International Paper (Coplin Plantation), but they were unable to find anything.

5. Item #9 is incorrect.

I just talked with Woodlot about this and I will change NO to YES under the question: "Will your proposal alter an acre or more of any land area, either upland or wetland?"

S-2 Form Questions

6. Financial capacity - Jeff, after I thought about it, it seems like a letter verifying the financial capacity that you said could be prepared may be a good idea.

The attached pdf (document.pdf) is a letter from Randy Mann of Edison Mission Energy verifying the financial capacity for this project.

7. MHPC's letter says that additional information, specifically a visual impact study, is needed for them to make their final Section 106 decision in regard to the AT, but I think elsewhere you stated that MHPC was ok with the project?

"I spoke with Mike Johnson at MHPC on 1/17 and mailed a permitting cd that day. They will respond to us with the results of their evaluation on the visual effects to the AT (pursuant to Section 106 of the National Historic Preservation Act of 1966) within 30 days of receiving the cd."

Wetland Supplement Form:

8. The form needs amending - can't say these are "logging roads".

We will remove the word "logging" from both spots it appears on this form.

9. Also, add a reference to where the rest of the wetlands assessment discussion is to the form. Otherwise, there are some loose ends. There needs to be a tight discussion about the cleared areas vs the permanently altered areas, and why they were considered separately.

Under question 1, I will add

For more detail on wetlands, please refer to Section 9.4 (wetland impacts) in the Wildlife & Fisheries Overview in Section 7 of this permit application.

10. Where are the utility line cleared wetland areas shown / summarized?

Wetland impacts are embedded in the Wildlife and Fisheries Section (7) of the permit application. See Section 9.4 beginning on page 102 for the information you're looking for.

D-PD Subdistrict Rules:

11. Is whether the project is "realistic and can be financed, and market viability exists" addressed completely? Please list all sections where anything about this is discussed. The

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section I saw didn't appear to be complete. Maybe I missed something.

The entire Demonstrated Need text in the Development Description in Section 1 describes a project that is realistic and has market viability. The following sections address specific issues.

Realistic:

- 1. "Transmission and Interconnect Studies", page 18 of the development description in section 1 discusses Redington's queue position with ISO New England and electrical studies conducted by CMP.*
- 2. "Ongoing Economic Sustainability", page 19 of the development description in section 1 describes the relatively low cost of wind power.*
- 3. "Utilizes Best Reasonably Available Site", page 35 of the development description in section 1 discusses the wind resource.*
- 4. A description of all technical components required for construction begins on page 46 of the development description.*

Can Be Financed:

- 1. Section 3, Financial Capability*

Market Viability:

- 1. Stable Electricity Prices on page 16 of the Development Description. The project is working with a power marketer and will announce the details once the agreement is signed.*

Other

12. Please provide the acreage of the existing and proposed gravel pits, not just the amounts of gravel to be taken.

All gravel / shale pits currently on Dallas property are less than 1 acre in size. The project will keep the pits under the 5 acre limit specified in LURC rules. We are looking at less expensive ways to acquire the gravel needed either by purchasing it or using gravel extracted at the construction site.

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Revision 1.1 Clarifications from January 24, 2006 email from LURC

1. Section 1, Appendices 8.3 and 8.4 appear to be the same document. But the Table of Contents says 8.3 should be opening up to the Vista Road Specifications, and 8.4 should be opening up to the Vista Transport Guidelines. Both 8.3 and 8.4 open up to the Vista Transport Guidelines.

You are right. Appendix 8.3 is an electronic version of the V80 Vestas Transportation Guidelines and Appendix 8.4 is a scanned version from the hardcopy. They are the same document. In the meantime we have received the Vestas V90 Transport Manual which will replace both 8.3 and 8.4 in the next version (1.1) of the permit application.

2. Do you have letters from the sheriff and fire department confirming that these services will be available?

For fire services - see answer to question 6. For policing services, the area is served by the state police and the local sheriff's department. They alternate on a weekly basis for coverage in the Redington Township area.

Letters have been obtained and have been included in the application.

3. Do you have documentation (letters, emails, contact person, etc) from MDOT confirming that the use of the public roads to transport the turbines can be done as proposed? What about transport by rail to Waterville?

Maine DOT requires the exact port of entry and route driving information to perform a road and route analysis. It is still too preliminary to provide this level of detail.

Maine DOT performs the analysis of the roads, but permits for moving large loads on Maine highways are issued by the Maine Bureau of Motor Vehicles.

A number of methods have been reviewed for the transportation of turbine components. The components are manufactured in Denmark and transported via ship to a Northeast US port of entry which may be Portland, Boston, Searsport (or another suitable port for handling loads of this size). Final routing will be determined by cost and road constraint. At that point, permits will be obtained.

Large wind turbine components have been successfully delivered in almost every state, and in numerous countries. There is no reason to assume that components cannot be successfully transported in and to Maine. Specialized heavy-freight companies are contracted to haul these oversize and heavy loads. These companies have specially designed equipment developed to minimize loads on roads and maximize the ability to move this equipment in all types of circumstances.

We expect that under the turbine procurement agreement with Vestas, the wind turbine manufacturer, will be responsible for delivery of the turbines from the manufacturing location to the project site. Thus, it is the responsibility of Vestas to determine what port to use, what route to take, what method of transportation, etc. And it will be Vestas' responsibility to obtain whatever port or road transportation permits as may be required.

4. Since you stated that the Navy is taking a "neutral" position on this project, does that mean that they will not be responding one way or the other to questions such as do they care about the reduced setbacks for turbines 11, 24?, 25 and 26? Do you have any documentation of the communications with the Navy about this? A contact person?

We have no "official letter" from the Navy, since they have not had opportunity to review our final

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permitting document and configuration. Our contact person is Tony Williams (Facilities Planner) at 921-1703. Another contact is Kari Moore (Environmental Coordinator) at 921-2772. Jason has sent Tony a link to the LURC website that contains our initial permit document so they can review our latest design plan.

5. Where is the information on the reference towers located in the application? Will they be over 200 feet? What will they be used for?

The meteorological reference towers are described in the Development Description (Section 1) on page 27 under Existing Facilities and on page 44, Description of Activities. The reference towers provide valuable feedback on the performance of the wind farm and the turbines. They are placed upwind of the turbines and are utilized to determine if the wind turbines are functioning properly and producing the correct amount of electricity given the wind speed.

The reference towers would be installed in two stages. Initially, taller towers would be installed for turbine verification. After the verification process is completed they would then be reduced in height and kept as permanent towers.

The taller reference towers are necessary to perform turbine power curve verification checks. These initial towers are anticipated to be 80m (260') tall. Once the wind turbine's performance has been verified and calibrated, the taller tower would be reduced to a height of 60m (196'). The towers will be instrumented with calibrated anemometers and wind vanes to measure wind speed and direction at multiple height levels.

These towers would be a guyed structure and slightly larger than the temporary 8" MET towers being 18" to 24" wide. The tower in the temporary, taller form would require FAA lighting. In their shorter form, they will be unlighted. They are not located on prior MET tower sites, since they need to be upwind of the new turbines (past met towers have been located at potential turbine sites). The tower site would require a minimal cement foundation for support. On Redington, a turn-around already exists to access the tower location – on Black Nubble, a "skidder-trail" type of road would be required for installation. Guy wire radius would depend upon the height of the tower and the topography at the site. Minimal clearing would be required for the base and the guy wire anchor points. No blasting would be required.

The final tower requirement will depend upon cost, need, suitability for the site, and the analytical requirements necessary to efficiently operate and monitor the turbines.

6. The application said you haven't yet reviewed the project with local fire marshals (who, specifically). What about the State Fire Marshal? What if they require some change to the proposal? I'm not clear which aspects of the proposal they would be concerned with. Please explain.

Jason Huckaby has had initial discussions with local fire marshals and the State Fire Marshal's office. The goal of our initial discussions with local officials was to inform local emergency personnel of our project and get preliminary feedback. Some of the discussions have led to initial planning and ideas for emergency services.

Unit Forest Ranger, Mark Rousseau, has sent a letter stating that they are responsible for suppressing forest fires in that area.

Our application discusses emergency services on pages 42-43 of the Development Description. Other than standard first-aid kits, no additional "emergency services" would be provided by RMW / MMP.

The state fire marshal does not have jurisdiction over this project because we will not have structures holding more than 20 people. Local fire chiefs in the towns of Rangeley, Carrabassett Valley, and Stratton will be the responders to any emergency our project may encounter. These towns do not officially work

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with unorganized townships - like Redington Township - but they do work with the Maine State Forest service. The Maine State Forest Service is the entity responsible for fire services for unorganized territories. The local fire responders have equipment for dealing with access to remote sites. The letter has been included in our revisions section of the permit.

7. Do you have photos of the tops of Redington Mtn and Black Nubble taken at the top of those mountains? I saw the section with the road pictures and the pictures of the ridges from a distance in the visual assessment, but no close ups of habitat and site conditions where the turbines would be. The Commission likes to see these, and the application form specifies them as an exhibit. Maybe they are included, but I missed them?

*Look at Visual Section, Photo Section, Appendix C pictures 157 and 158.
Also in the Wildlife and Fisheries Section,*

photo 3, page 6,

photo 11, p. 12

photo 17, p. 15

photo 20, p. 16

photo 21, p. 17

photos 23-25, p. 36

photo 29, p. 80

8. Do you have the results of the geotechnical borings done this fall? Did they give an indication of the type of foundation that you need to use? The amount of clearing and disturbance for each turbine could vary widely, depending on which foundation is needed.

Our construction experts offer this opinion for our foundation designs: Presently, our foundation design assumption for the Redington project is a gravity spread footing that will have a diameter range of approximately 53'-56', a depth of approximately 7', and a perimeter thickness of approximately 2.5'-4.0' with a neat concrete volume of 375-500 cubic yards. The geometry of the foundation will be very similar to the Gravity Type Foundation drawing in Appendix 7.0 of Section 1 of the Permit Application documents.

Yes, the three borings performed on Black Nubble gave us a good idea of the type of soil conditions to expect on Black Nubble which was the only area accessed due to weather constraints for using the helicopter to achieve that access. Further borings will begin when weather permits. Many borings will need to take place after a permit is received (due to access constraints) to further our knowledge on soil and rock conditions on Redington and Black Nubble.

Yes the borings were the basis of the statements above made by our construction experts.

9. In Section 1, the project summary table just shows the total wetland impact. Maybe in the far right column you could break out the amount that is just clearing. This is important, and should be shown up front. Otherwise, the project appears to require a Tier 3 review (or 'Individual Permit' in the Corps' terms), which would mean you should be submitting things like a functional assessment and mitigation plan. But, since we all (LURC, DEP, and the Corps) met and agreed on the approach you are taking, the amount of permanent alteration vs clearing needs to be specified. I know it's in the report later on in the application, but I would hate for anyone just looking at the table to get the wrong impression.

I will update the table as follows:

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	<i>Wetland Impact</i>	<i>Comments</i>
<i>Roads</i>	<i>.31 acres of permanent impacts .13 acres of temporary impacts due to clearing</i>	<i>Of the .31 acres, .17 acres need LURC permit; .14 acres exempt. For additional detail, see pages 103-104 in the Wildlife and Fisheries document in Section 7.</i>
<i>Turbines</i>	<i>0 acres</i>	
<i>Transmission Line</i>	<i>0.0 acres of permanent impacts 8.99 acres of temporary impacts due to clearing.</i>	<i>Temporary impacts due to clearing. Refer to table 7-15 in Section 7, Wildlife and Fisheries</i>

10. Do you have the CMP phase I study? It seems like it would be a good idea to include it in the application somewhere as an appendix.

The CMP Phase I Study was a 30MW study conducted several years ago. In 2004, CMP started a 60MW study (Phase II) and wanted to combine the 2 studies for the entire 90MW. ISO asked us to withdraw those 2 studies and request a single 90MW System Impact Study. On June 15, 2005, RMW formally withdrew the request for the 30MW and 60MW studies and asked ISO to complete a single study on the entire 90 MW. The final study report (which will in the next version of the permit application) has removed any phase I/phase II designations.

The System Impact Study is actually comprised of 2 studies, the steady state (completed March 2005) and the stability study. As of the beginning of February 2006 ISO-NE and CMP completed the stability portion and published the final System Impact Study. Approval of this study is expected at the next Reliability Committee (RC) meeting of ISO on February 14th. The next version (1.1) of the permit application will include this latest study.

Refer to Transmission and Interconnect Studies on page 18 of the Development Description in Section 1 for details on the electrical studies involved.

11. The road design section does not appear to include Dave Rocque's recommendations (layering vs ditches for controlling runoff), which were discussed endlessly, and we expected to see in the application. If they can't be used, state why somewhere in the application. For example, do the Vistas Road Specifications (the missing document in Section 1- 8.3) require that certain road designs be used that would preclude using Dave's recommendations? Or, if they are incorporated throughout the design narrative but I didn't realize it, explain that, too.

Marcia, this is Dwight Anderson's response to this question:

Details for the drainage layer are provided on sheets C-20 and C-22. Groundwater seeps and subterranean flow is discussed in the Stormwater Management Report - Section 7.1. Trap-rock to address subgrade drainage is also mentioned in Section 6.0 of the Roadway Design Section and further elaborated on in the E&S report in sections 3.2 and 5.0 with illustrations.

Dave's drainage concern was summarized in the memo from our Nov. 2003 site visit which I e-mailed to you on Aug. 18th, 2005 [in Appendix 2.7 of Section 1]. Dwight says "yes", he has included Dave's recommendations.

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Revision 1.1 Clarifications from January 25, 2006 email from LURC

1. As I previously mentioned, I think the road design/soils/erosion control/Dave Rocque question has been answered, as long as the road design does indeed address Dave's concerns and recommendations. Please verify.

Yes, this has been addressed. You will see Dwight Anderson's response to question 11 in our previous email.

2. Just a thought, but maybe you should move the "Protected Soils Map" to the 'Soils' section. Or, at least create a link to it. Also, you should rename that map "(P-SG) Soil and Geology Protection Subdistrict".

Good point. We put the map in section 1 because it is referenced in the rezoning request in the very first paragraph of the development description. We will rename it. It is not referenced in the soils section.

3. If you haven't already elsewhere in the application, please provide more detail for the cost estimate in the Financial Capacity section. While I understand that it may not be possible to supply a huge amount of detail at this point, the breakdown in the application is too bare-bones and should be fleshed out.

The following estimate is based on preliminary draft contractor bids. I will add this to the financial capacity section of the permit application.

<i>Turbine cost, including transportation</i>	<i>86,600,000</i>
<i>Turbine installation</i>	<i>7,000,000</i>
<i>Foundations</i>	<i>7,000,000</i>
<i>Transmission Lines</i>	<i>4,000,000</i>
<i>Roads</i>	<i>13,000,000</i>
<i>Electrical and Transformers</i>	<i>5,000,000</i>
<i>Other Balance of Plant</i>	<i>1,000,000</i>
<i>Interconnection</i>	<i>3,000,000</i>
<i>Development</i>	<i>1,400,000</i>
<i>Soft Costs</i>	<i>2,000,000</i>
<i>Total:</i>	<i>130,000,000</i>

4. One last thing - I am going to try to find the various sections where ISO-NE's role and feedback is discussed, but if you can point to the section(s), it would help.

Refer to transmission and interconnect studies on pages 18-19 of the Development Description in Section 1.

Revision 1.1 Clarifications from January 26, 2006 email from LURC

I'm just curious, but as I started looking a bit more at the TRI section (deeds, etc) today, I wondered about the subdivision history. If you remember, I asked about other land divisions and lot numbers in my first "application completeness" email to you a week or so ago. Correct me if I wrong - The Redington Mtn. parcel was purchased in March 1998. Approximately 5 years and 6 months later in October 2003, the Black Nubble parcel was purchased. The Black Nubble Deed also includes the maintenance lot parcel and an easement to use the road. The map shows the Black Nubble parcel and the maintenance lot as being one large lot connected by a skinny section (i.e. the road easement). But, since the road easement is not in fee ownership, how did a subdivision not occur when the Black Nubble lot and the maintenance building lot were formed?

The two lots are connected by a strip of land that is owned in fee.